

MORRISON FOERSTER

250 WEST 55TH STREET
NEW YORK
NEW YORK 10019-9601

TELEPHONE: 212.468.8000
FACSIMILE: 212.468.7900

WWW.MOFO.COM

MORRISON & FOERSTER LLP
AUSTIN, BEIJING, BERLIN, BOSTON,
BRUSSELS, DENVER, HONG KONG,
LONDON, LOS ANGELES, MIAMI,
NEW YORK, PALO ALTO, SAN DIEGO,
SAN FRANCISCO, SHANGHAI, SINGAPORE,
TOKYO, WASHINGTON, D.C.

May 16, 2024

Writer's Direct Contact
+1 (212) 468-8049
CCohen@mofo.com

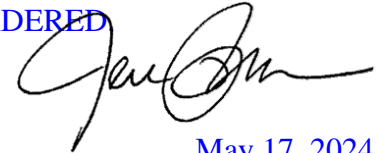
Via ECF

The Honorable Jesse M. Furman
United States District Judge
Southern District of New York
United States Courthouse
40 Foley Square
New York, New York 10007

The Court will reserve judgment on the propriety of the proposed redactions until sentencing. That said, no later than May 22, 2024, Defendant shall file a supplemental letter brief, not to exceed three pages, addressing whether the proposed redactions of information concerning those who have written in support of Defendant are consistent with the presumption in favor of public access. The Government shall file a response, not to exceed three pages, by May 24, 2024. The Clerk of Court is directed to terminate ECF No. 258.

Re: *United States v. Winkelbauer, et al.*
23 Cr. 133 (JMF)

SO ORDERED



May 17, 2024

Dear Judge Furman:

We represent Defendant Lars Winkelbauer in the above matter and respectfully seek leave to redact two categories of information in connection with Mr. Winkelbauer's sentencing submission.

First, Mr. Winkelbauer respectfully seeks leave to redact the names and personally identifiable information of four authors of letters that we intend to submit in support of his Sentencing Memorandum. Mr. Winkelbauer seeks these redactions due to concerns of potential retaliation from their respective employers if their names are public. Second, Mr. Winkelbauer respectfully requests leave to redact a limited amount of sensitive information about the effect this case has had on Mr. Winkelbauer's minor son.

These redactions go beyond the scope of this Court's Individual Rules and Practices in Criminal Cases Rule 10(A), and therefore require Court approval. The government has no objection to either request.

Respectfully submitted,

S/ Carrie H. Cohen
Carrie H. Cohen

cc: AUSAs of Record via ECF